

# Timothy D. McNair

ATTORNEY AND COUNSELOR AT LAW

December 8, 2005

VIA FACSIMILE ~ 412-471-8748

Edmond R. Joyal, Jr., Esquire  
Law Office of Joseph S. Weimer  
975 Two Chatham Center  
Pittsburgh, PA 15219

Re: Abby Conley v. County of Erie, et al.

Dear Mr. Joyal:

I am in receipt of your rubber stamp letter of December 8<sup>th</sup>. I doubt very much that the problem is exclusively in the production of documents, since we are in possession of a number of documents. The problem is we cannot identify the documents. We need to have your client identify the specific documents for us so that we can see how they fit into the case and therefore judge their applicability to the various claims and defenses presented. I don't believe I am being unreasonable in this regard and I realize this places some burden on you.

In order to avoid copying costs, you may produce the documents at my office and I will gladly copy them on my machine that I have here.

We are, as you suggested in your recent email, in the process of drafting a Motion to Compel which I hope can be heard at the same time as Mr. Lane's Motion.

Thank you.

Very truly yours,

LAW OFFICES OF TIMOTHY D. McNAIR

By



Timothy D. McNair, Esquire

TDM/alm

Cc: Anthony Angelone, Esquire  
Mark Lane  
Abby Conley

821 STATE STREET • ERIE, PENNSYLVANIA 16501-1316  
TELEPHONE 814.452.0700 • FAX 814.452.0701 • TOLL FREE (800)453-0566  
E-MAIL TMCNAIR@VMEPCOM WWW.MCNAIRLAW.COM

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EXHIBIT

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